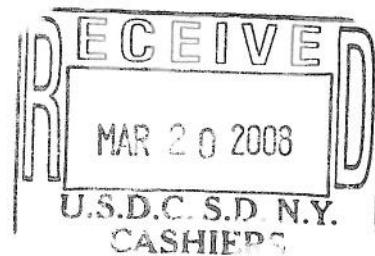


Judge McCMahon

Martin F. Casey (MFC-1415)
CASEY & BARNETT, LLC
317 Madison Avenue, 21st Floor
New York, New York 10017
(212) 286-0225
Attorneys for Plaintiff

08 CV 02930



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
REGAL FOREST HOLDING CO., LTD.,

08 Civ.

Plaintiff,

- against -

COMPLAINT

M/V HANSA BERGEN, her engines, boilers, etc;
and A.P. MOLLER – MAERSK A/S,

Defendants.
-----X

Plaintiff, by its attorneys, CASEY & BARNETT, LLC, as and for its Complaint, alleges
upon information and belief as follows:

1. This is an admiralty and maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure. Jurisdiction is predicated upon 28 U.S.C. § 1333.
2. Plaintiff, Regal Forest Holding Co., Ltd., is a corporation with an office and place of business located at Hodge Plaza, 2d Floor, Road Town, British Virgin Islands, and was the cargo consignee and owner of a consignment of 156 sets color televisions laden into Container MSKU 6273055 and loaded on board the M/V Hansa Bergen, as more fully described below.

3. Defendant, A.P. Moller-Maersk A/S (hereinafter "Maersk") is a foreign corporation with an office and place of business located at Giralda Farms, Madison Avenue, Madison, New Jersey 07940, and at all relevant times was and is doing business in this jurisdiction directly and/or through an agent and was at all times acting in the capacity of a common carrier and was the owner, charterer, manager, and/or operator of the M/V Hansa Bergen.

4. At all material times, the M/V Hansa Bergen was and is a diesel-powered, oceangoing vessel engaged in the common carriage of cargoes on the high seas and may be within the jurisdiction of this Honorable Court during the pendency of process hereunder.

5. Plaintiff brings this action on its own behalf and as agent and/or trustee on behalf of and for the interest of all parties who may be or become interested in the said consignment, as their respective interests may ultimately appear, and plaintiff is entitled to maintain this action.

6. On or about April 24, 2007 a consignment consisting of 156 color television sets, laden in ocean container number MSKU 6273055, then being in good order and condition, was delivered to defendant Maersk at the port of Lazaro Cardenas, Mexico for transportation to Puerto Quetzal, Guatemala, in consideration for an agreed freight pursuant to Maersk bill of lading number MAEU 854282344 dated April 24, 2007.

7. Thereafter, the aforementioned consignment was loaded aboard the M/V Hansa Bergen and the vessel sailed for its intended destination.

8. When the vessel arrived in Puerto Quetzal and subsequently delivered to the consignee, it was ascertained that Maersk had failed to properly care for the cargo during transit in that the container had suffered pilferage causing damage to the consignment. A total of 31 color television sets were found to be missing and/or otherwise damaged. It was also noted that

the seal present on the container was not a Maersk seal as had been placed on the container at origin.

9. The damage to the aforementioned consignment did not result from any act or omission on the part of plaintiff or shipper, but to the contrary, was the result in whole or in part, of the negligence and/or fault of the defendant Maersk and/or the unseaworthiness of the M/V Hansa Bergen.

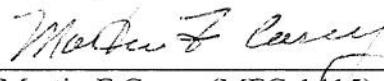
10. By reason of the foregoing, plaintiff has been damaged in the amount of at least \$7,500, no part of which has been paid, although duly demanded.

WHEREFORE, Plaintiff prays:

1. That process in due form of law may issue against Defendant citing it to appear and answer all and singular the matters aforesaid;
2. That judgment may be entered in favor of Plaintiff and against Defendant for the amount of Plaintiff's damages, together with interest and costs and the disbursements of this action, and
3. That this Court grant to plaintiff such other and further relief as may be just and proper.

Dated: New York, New York
March 20, 2008
299-220

CASEY & BARNETT, LLC
Attorneys for Plaintiff

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